

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JEFFREY HARRIS, Derivatively On Behalf of : Case No. 07-cv-9841 (SHS)
CITIGROUP, INC., :

Plaintiff,

vs.

CHARLES PRINCE, ET AL.,

Defendants,

-and-

CITIGROUP, INC., a Delaware corporation,

Nominal Defendant.

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GARY CINOTTO, Derivatively On Behalf of : Case No. 07-cv-9900 (SHS)
CITIGROUP, INC., :

Plaintiff,

vs.

CHARLES PRINCE, ET AL.,

Defendants,

-and-

CITIGROUP, INC., a Delaware corporation,

Nominal Defendant.

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BENJAMIN NATHANSON, Derivatively On : Case No. 07-cv-10333 (SHS)
Behalf of CITIGROUP, INC., :

Plaintiff,

vs.

CHARLES PRINCE, ET AL.,

Defendants,

-and-

CITIGROUP, INC., a Delaware corporation,

Nominal Defendant.

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SAM COHEN, Derivatively On Behalf of : Case No. 07-cv-10344 (SHS)
CITIGROUP, INC., :

Plaintiff,

vs.

CITIGROUP, INC., ET AL.,

Defendants.

WALTER E. RYAN, JR., derivatively on behalf
of CITIGROUP, INC.,

Case No. 07-cv-11581 (UA)

Plaintiff,

vs.

CHARLES PRINCE, ET AL.,

Defendants,

-and-
CITIGROUP, INC., a Delaware Corporation,
Nominal Defendant.

**PLAINTIFF JEFFREY HARRIS' NOTICE OF MOTION AND MOTION TO
CONSOLIDATE ALL RELATED SHAREHOLDER DERIVATIVE ACTIONS AND
APPOINT A LEADERSHIP STRUCTURE FOR PLAINTIFFS**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on Plaintiff Jeffrey Harris, by and through his counsel , will hereby move this Court on a date and time as may be designated by the Court, at 500 Pearl Street, New York, NY for an Order (submitted concurrently herewith) to: (i) consolidate *Harris v. Prince, et al.*, 07-CV-9841 (SHS); *Cinotto v. Prince, et al.*, 07-CV-9900 (SHS); *Nathanson v. Prince, et al.*, 07-CV-10333 (JSR); *Cohen v. Citigroup, Inc., et al.*, 07-CV-10344 (SHS); *Ryan v. Prince, et al.*, 07-11581, and all other related Citigroup, Inc. shareholder derivative actions subsequently filed in this Court; (ii) appoint Jeffrey Harris as Lead Plaintiff; and (iii) appoint Robbins Umeda & Fink, LLP and the Law Offices of Thomas G. Amon as Lead Counsel for these actions.

This motion is based on this Notice of Motion, the Memorandum of Points and Authorities in support thereof, the Declaration of Thomas G. Amon, the Declaration of Plaintiff

Jeffrey Harris, and any arguments made before the Court at the hearing of this Motion and all other papers and pleadings on file in this action.

DATED: January 17, 2008

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s/Thomas G. Amon
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